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9 Attorneys for Defendants
10 I-DOCSECURE, LLC,
11 E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC, INTEGRITY
DATA APPLICATIONS CONSULTING LLC,
JOSEPH BAGGIO and JONATHAN BALZORA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 7/6/06

16 ISMART INTERNATIONAL LIMITED,
an India Corporation,

Plaintiff,

Defendants.

CASE NO. C 04-03114 RMW

STIPULATION AND [PROPOSED] ORDER
REGARDING EXPERT DISCLOSURES AND
DISCOVERY

Judge: Hon. Ronald M. Whyte

1 WHEREAS, the deadline for expert disclosures pursuant to Federal Rule of Civil
2 Procedure 26 is currently set for June 16, 2006;

3 WHEREAS, Plaintiff iSmart International has filed a Motion for Leave to Amend
4 Complaint and for a Request to Issue a New Case Management Scheduling Order (the "Motion"),
5 and the defendants have opposed this Motion in its entirety;

6 WHEREAS, the parties have agreed to set new dates for expert disclosures and discovery
7 pending the ruling on the Motion, which would govern in the event that the Motion was denied;

8 THEREFORE, the parties hereby agree as follows:

- 10 1. The deadline for initial expert disclosures shall be July 17, 2006.
- 11 2. The deadline for rebuttal expert disclosures shall be August 7, 2006.
- 12 3. The deadline for completion of expert discovery shall be August 25, 2006.
- 13 4. In the event that the pending Motion is granted, the parties agree to meet and
14 confer further to determine the extent to which these dates should be modified.

16 DATED: June 13, 2006

17 MICHAEL N. EDELMAN
18 PAUL, HASTINGS, JANOFSKY & WALKER LLP

19 By: 

20 MICHAEL N. EDELMAN

21 Attorneys for Defendants
22 I-DOCSECURE, LLC, E-NETSECURE SERVICES,
23 INC., ISMART SECURE LLC, and JOSEPH BAGGIO

1 DATED: June 12, 2006

2
3 JOSEPH KOURI
4 SEDGWICK, DETERT, MORAN & ARNOLD LLP

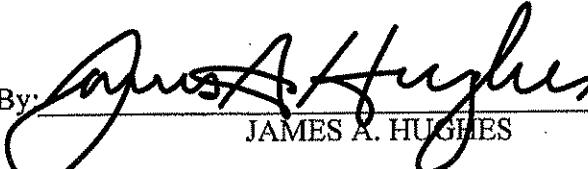
5 By: 

6 JOSEPH KOURI

7
8 Attorneys for Plaintiff and Counterdefendant
9 iSMART INTERNATIONAL LIMITED and
10 Counterdefendant RAJ DHESIKAN

11 DATED: June __, 2006

12 JAMES A. HUGHES
13 SULLWOLD & HUGHES

14 By: 

15 JAMES A. HUGHES

16
17 Attorneys for Defendants INTEGRITY DATA
18 APPLICATIONS CONSULTING, LLC, and
19 JONATHAN BALZORA

20 IT IS SO ORDERED.

21 Dated: 7/6, 2006

22 By: /s/ Ronald M. Whyte

23 Hon. Ronald M. Whyte
24 United States District Court Judge